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MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: February 10, 2022

CONSENT LETTER MOTION

Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
Thurgood Marshal Courthouse
40 Foley Square
New York, NY 10007

RE: United States v. Tonya Thomas (Rose, et al), 19 Cr. 789 (PGG)

Your Honor:

I am writing to request a modification of my client's bail conditions to include the State of New Jersey as part of the geographic limitations for her travel without having to make specific travel requests to the Court.

My client is currently released on a PRB with two co-signers, and her travel limits include the Southern and Eastern District of New York. I am asking that the limits be extended to the State of New Jersey.

My client has many friends with whom she likes to visit for weekend trips in New Jersey, and would like to be able to do that without bothering me or the Court for permission each time she wants to go there.

I have consulted with AUSA Mathew Andrews and my client's Pre-Trial Officer, Laura Gialanella, [(646) 864-6852, email: Laura_gialanella@nyspt.uscourts.gov], and neither has any objection to the request.

I thank the Court in advance for Your Honor's consideration of this application. Please note that she would like to be able to make a weekend trip this

weekend (starting tomorrow).

Sincerely,

/s/ Thomas H. Nooter

Attorney (co-counsel) for Defendant

cc: AUSA Mathew Andrews, by ECF
U.S. Pretrial Services Officer Laura Gialanella, by email